



EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 956-7000

June 29, 1994

94-RF-06984

T.E. Lukow, Deputy
Source Evaluation Board
DOE, RFFO

Attn: R. J. DiSalvo and W. J. Prymak

COMPLETION OF COMPREHENSIVE TREATMENT AND MANAGEMENT PLAN (CTMP) DRAFT
MILESTONES FOR LOW LEVEL MIXED (LLM) SOLVENT CONTAMINATED WASTES
TREATMENT SYSTEM-NON-THERMAL (SYSTEM 1B)- ALS-259-94

In accordance with the terms of the Land Disposal Restriction (LDR) Federal Facility Compliance Agreement II (FFCA II), Docket No. RCRA (3008) VIII-89-25, the CTMP shall propose primary and secondary milestones for which the Department of Energy (DOE) will be held accountable for the development and implementation of treatment or management technologies to achieve compliance with LDR requirements.

The CTMP identifies a secondary milestone entitled "Start Treatability Study Exemption (TSE) Preparation" and a primary milestone entitled "Submission of the Treatability Exemption Study" for the Low Level Mixed (LLM) Solvent Contaminated Wastes Treatment System Non-Thermal to be completed by July 1994 and August 1994, respectively.

The Colorado Code of Regulations and the Code of Federal Regulations, reference 6 CCR 1007-3 Parts 260.10 and 40 CFR Parts 260.10 respectively, defines a treatability study as follows: "a study in which a hazardous waste is subjected to a treatment process to determine; (1) whether the waste is amenable to the treatment process, (2) what pretreatment (if any) is required, (3) the optimal process conditions needed to achieve the desired treatment, (4) the efficiency of a treatment process for a specific waste or wastes, or (5) the characteristics and volumes of residuals from a particular treatment process." As a result, a treatability study is only appropriate if a hazardous waste is utilized in a study to address one or more of the development objectives stated above.

Several promising non-incineration treatment technologies including biodegradation, mediated electrochemical oxidation, silent discharge plasma/packed bed reactor, supercritical water oxidation, catalyzed wet chemical oxidation and UV/oxidation are currently being evaluated. These technologies have been undergoing non-radioactive laboratory development at Department of Energy (DOE) laboratories and commercial firms outside the state of Colorado. To date, technology testing involves the use of organic compounds provided from raw material stock as surrogate testing material in lieu of actual hazardous waste. The organic compounds being destroyed or removed are not considered a Resource Conservation and Recovery Act (RCRA) solid waste prior to

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treatment since they were manufactured and are being used as a product for an intended purpose. It should be noted that the development objectives associated with these studies are consistent with those described in the definition of a treatability study; however, formal preparation and submission of a TSE is not appropriate or required since RCRA hazardous waste is not utilized.

Questions and comments regarding the completion of the CTMP milestones for the Low Level Mixed (LLM) Solvent Contaminated Wastes Treatment System (Non-Thermal) should be directed to Scott Anderson at 273-6164.



A. L. Schubert, Program Manager
Waste Programs
EG&G Rocky Flats, Inc.

DWS:ces

Orig. and 1 cc - T. E. Lukow